

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

HOWARD TRENT TYSON, SR., \*

Plaintiff \*

v. \* Civil Action No.: \_\_\_\_\_

WELLS FARGO HOME MORTGAGE, INC. \*

Defendant \*

\* \* \* \* \*

**NOTICE OF REMOVAL**

Defendant Wells Fargo Home Mortgage, Inc. ("Wells Fargo"), by its attorneys and pursuant to 28 U.S.C. §§ 1331 and 1441, et seq., files this Notice of Removal and as grounds for removal states:

1. Plaintiff Howard Trent Tyson, Sr. ("Plaintiff"), filed suit against Wells Fargo in the Circuit Court of Maryland for Prince George's County, on or about August 3, 2012. The case was docketed as case no. CAL 12-23069.
2. Defendant has not been served with the Summons or the Complaint.
3. Plaintiff's Complaint alleges violation of federal consumer protection laws in connection with his mortgage loan.
4. Therefore, this action is subject to removal pursuant to 28 U.S.C. §§ 1331 and 1441(b) at the request of Defendant because Plaintiff's claims arise under the law of the United States.

5. Plaintiff also asserts a claim under state consumer protection laws. This Court has supplemental jurisdiction over this state law cause of action pursuant to 28 U.S.C. § 1337.

6. Removal is timely because Defendant has not yet been served with the Summons or the Complaint in this action.

7. Pursuant to 28 U.S.C. § 1441(a), the United States District Court for the District of Maryland is the proper venue for removal because Prince George's County, the place where this action is pending, is located within the District of Maryland.

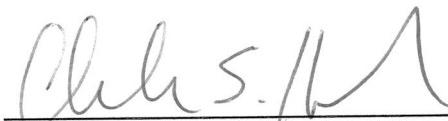
8. A copy of this Notice has been sent to Plaintiff and will be filed with the clerk of the Circuit Court of Maryland for Prince George's County.

9. Filed with this Notice is a copy of the Complaint, which Defendant obtained from the Circuit Court, as well as all of the other documents contained in the Circuit Court's file.

10. By filing this Notice, Wells Fargo does not waive its rights to object to service of process, the sufficiency of process, venue, or jurisdiction, and specifically reserves the right to assert any defenses and/or objections to which it may be entitled.

WHEREFORE, Defendant hereby provides Notice of its removal of this action to the United States District Court for the District of Maryland and requests that this Court assume full jurisdiction over this cause as provided for by law.

Respectfully submitted,



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Charles S. Hirsch (Fed. ID No. 06605)  
Robert A. Scott (Fed. ID No. 24613)  
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Baltimore, Maryland 21202  
Telephone: 410-528-5600

*Attorneys for Defendant*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 13<sup>th</sup> day of December, 2012, a copy of the foregoing Notice of Removal was mailed by first class mail, postage prepaid to:

Howard Trent Tyson, Sr.  
12018 Long Ridge Lane  
Bowie, Maryland 20715



Charles S. Hirsch